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January 22, 2024

**VIA ECF**

Hon. Sarah Netburn  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: **Devin G. Nunes v. NBCUniversal Media, LLC, 1:22-cv-01633-PKC-SN**

Dear Magistrate Judge Netburn:

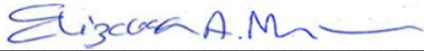
Plaintiff Devin G. Nunes (“Plaintiff”) and Defendant NBCUniversal Media, LLC (“NBCU”) respectfully submit this joint letter in accordance with Your Honor’s January 18, 2024 Order (the “Order”) (Dkt. 88) directing the Parties to provide an alternative briefing schedule to address the Speech or Debate Clause Privilege and preservation issues raised in the Parties’ January 16, 2024 letter to the Court.

The Parties have not yet received the transcript for Jacob Langer’s deposition, but anticipate that it will be delivered on Thursday, January 25, 2024. Additionally, as discussed in the Parties’ January 16, 2024 letter, Todd B. Tatelman, counsel for the House Permanent Select Committee on Intelligence (“HPSCI”), asserted the Speech or Debate Clause Privilege during Mr. Langer’s deposition, not counsel for Mr. Nunes. As such, Mr. Tatelman will necessarily participate in briefing this issue. The Parties have conferred with Mr. Tatelman about a proposed briefing schedule and he has asked for additional time to confer internally with the relevant stakeholders at HPSCI, since the House of Representatives is not currently in session. Accordingly, the Parties respectfully request permission to update the Court on January 25, 2024, when they anticipate being able to propose a proposed briefing schedule to the Court. In the alternative, the Parties propose that Plaintiff and Mr. Tatelman file their letter briefs by February 13, 2024 and Defendant file its response by February 20, 2024.

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The Parties thank the Court for its time and attention to this matter.

Respectfully Submitted,



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